

PRIVACY POLICY

This Privacy Policy outlines the rules for collecting and processing personal data obtained from you through the www.remotly.com website (hereinafter referred to as the "Website" or "Site") by MIRILLIS CORE sp. z o.o., in accordance with applicable laws, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR). We make every effort to respect your privacy and protect the information you provide to us when using the Website.

Any capitalized terms in this Privacy Policy that are not otherwise defined shall have the meaning assigned to them in the [Website Terms of Service](#).

1. WHO PROCESSES YOUR DATA?

The controller of your data is MIRILLIS CORE spółka z ograniczoną odpowiedzialnością, based in Zielona Góra, ul. Fabryczna 14B /1 (65-410), registered in the Register of Entrepreneurs maintained by the District Court in Zielona Góra, 8th Commercial Division of the National Court Register under KRS number: 0001050325, NIP: 9292078550, REGON: 525981046 (hereinafter "we").

You can contact us by mail at the address above or via the contact form available on our Website at www.remotly.com under "Contact".

2. WHAT DATA DO WE COLLECT AND FOR WHAT PURPOSE?

2.1. SERVER LOGS

Within the operation of the Website, we only register selected system events – anonymously, without identifying Users or IP addresses. For example, if an account is deleted, only the fact of deletion associated with a given email address is recorded. We do not keep detailed logs of User activity on the Website nor do we profile behaviors based on logs.

We use servers provided by external companies, including Amazon CloudFront (CDN) for content distribution. As a result, personal data entered by Users into forms on our Website may be transmitted through the CDN server network. Amazon CloudFront accelerates content delivery, including dynamic requests such as form data, via edge servers located worldwide. Such data transfers are carried out on the basis of appropriate legal safeguards for personal data transfers outside the EEA, including the European Commission's adequacy decision of July 10, 2023, based on Amazon Web Services, Inc.'s participation in the "EU-U.S. Data Privacy Framework" and the relevant [Standard Contractual Clauses](#) concluded between us and the hosting provider.

We also use servers provided by:

- **OVH sp. z o.o.** – in this case, we use the option to store data exclusively within the European Union,
- **DigitalOcean, LLC (USA)** – for hosting the Remotly Community forum. Therefore, User data may be transferred outside the EEA based on appropriate legal safeguards, including the European

Commission's adequacy decision of July 10, 2023 (DigitalOcean, LLC's participation in the "EU-U.S. Data Privacy Framework") and, where applicable, [Standard Contractual Clauses](#) concluded in the hosting agreement.

2.2. CONTACT FORM

- Name and surname/Nickname (optional)
- Email address
- Any other data provided in the message content

The legal basis for this processing is our legitimate interest in handling your inquiry and providing a response [Art. 6(1)(f) GDPR], or, where applicable, our legal obligation [Art. 6(1)(c) GDPR] if your inquiry relates to issues regulated by law that require us to process your personal data.

Providing data is voluntary, but to some extent necessary to use the form.

We will store the data for the duration of the correspondence related to your inquiry, with an additional consideration for the applicable statute of limitations for claims that may be brought against us or that we may have against you. If a business relationship is established, data will be processed for purposes related to contract performance, about which you will be informed in detail at the cooperation stage.

2.3. REMOTLY COMMUNITY ACCOUNT AND POSTING

To create a Community Account, you must provide:

- Community Username
- Email address
- Password

We process this data to enable you to create, manage, and use your Remotly Community Account, based on Art. 6(1)(b) GDPR, as it is necessary to conclude and perform the Community Account agreement.

Providing this data is voluntary but required to create a Community Account.

We will store the data for as long as your Account is active, with additional consideration for the applicable statute of limitations for claims.

You may also choose to:

- Provide your date of birth (day and month) so other Community members and visitors know when your birthday is; you may also add your year of birth, thus sharing your age with other Users,
- Provide your location (e.g., country or city),
- Add your website address,
- Add a description about yourself,
- Add your usernames used in social media or communication tools (e.g., Skype),
- Add a profile photo,

- Add a signature,
- Publish Materials in your Posts.

From your account, you can also edit privacy settings, including what you allow other Users to see and notification settings (e.g., email summaries, software updates, etc.). You can change these settings at any time from your Account.

This data is processed based on your consent, given by actively adding the data and configuring privacy settings [Art. 6(1)(a) GDPR]. You can withdraw your consent at any time by editing your data and settings in your Account; this does not affect the lawfulness of processing based on consent before its withdrawal.

By default, we enable activity notifications (e.g., replies to your posts, quotes, comments, or new messages) to keep you updated. We treat this as part of our service and base it on our legitimate interest [Art. 6(1)(f) GDPR] – to facilitate Users’ use of the Community Account and communication with other members. You can disable or change these settings at any time in your Account’s privacy tab. For emails, you’ll find an unsubscribe link in each message.

You can delete your Community Account at any time by sending a deletion request directly to the Administrator via the Community platform. Deleting your account does not automatically remove content you have published (e.g., posts) in the Community. If you provided personal data in your username during registration and wish for it to no longer be visible after account deletion, please contact us for assistance.

Regardless of the above, in certain cases, we may have obligations related to moderating content shared on the forum. Accordingly, we may be required to retain data regarding deleted content and related decisions for the period required by law [Art. 6(1)(c) GDPR].

2.4. CREATING A REMOTLY CLIENT ACCOUNT

You can create a Client Account from our Website to manage various features of our Software under your chosen License Plan. For transparency, information regarding the processing of personal data in connection with creating a Client Account is provided in separate documents:

- For non-commercial Remotly Client Accounts: “[Privacy Notice for Remotly Software for Non-Commercial Users](#)”
- For commercial Remotly Client Accounts: “[Privacy Notice for Remotly Software for Commercial Users](#)”.

2.5. COOKIES

Cookies are small text files sent by the Website and stored on your device, containing certain information related to your use of the Site, which we access.

Cookies are used, among other things, to enable you to visit our Website, ensure it displays correctly, allow full use of its features, and protect our Website from abuse and spam.

With your consent, we may use cookies to analyze traffic on our Website.

More detailed information about the tools used on our Website can be found later in this Privacy Policy.

Our Website may contain links to other websites or applications, including those of our business partners. Please remember that other entities' websites may also use cookies or similar technologies. When clicking a link or application, keep in mind that each has its own cookie policy. Before using other websites or applications, we recommend reviewing their privacy policies.

2.5.1. TYPES OF COOKIES

Depending on how long they are stored on your device, cookies we use can be divided into:

- **Session cookies:** stored on the User's device and remain there until the end of the browser session. The saved information is then permanently deleted from the device's memory.
- **Persistent cookies:** stored on the User's device for the period specified in the cookie parameters or until deleted by the User.

We may use the following types of cookies:

- **Necessary cookies** - essential for the website to function properly, such as navigation. Most websites cannot function correctly without these cookies.
- **Analytical cookies** - help website owners understand how different Users interact with their site.
- **Marketing cookies** - used to track users across websites. The purpose is to display ads that are relevant and engaging for individual users, making them more valuable for publishers and advertisers.

A detailed and up-to-date list of cookies used by the Website along with can be found in the tool that allows you to manage your consent for the installation of specific types of cookies. You can access this tool via the link located in the footer of the Website under "Cookie Settings".

2.5.2. MANAGING COOKIES IN YOUR BROWSER

Most web browsers are set to allow cookies to be stored on your device by default, giving you the ability to manage and/or delete cookies according to your preferences.

To lawfully enable Users of our Website to consent to the installation of relevant cookies and, where applicable, related processing and sharing of personal data, we use a dedicated widget. User consent is recorded and documented by storing it locally in your browser as cookies. These files do not contain any personal data and are used solely to remember your cookie preferences. They are stored for 12 months. The legal basis for this processing is our legitimate interest in fulfilling the accountability principle under the GDPR [Art. 6(1)(f) GDPR].

A link to the tool used on the Website to manage your cookie preferences can be found under "Cookie Settings" in the footer of our Website.

Giving consent for cookie installation (for those cookies that are not essential for the functioning of the website — for example, analytical or marketing cookies) and, where applicable, related data processing is voluntary and does not affect your ability to use the Website.

To delete cookies stored on your computer, follow the instructions provided by your browser provider on their help page regarding cookie management.

2.6. TOOLS WE USE ON THE WEBSITE

2.6.1. hCaptcha

We use the hCaptcha service to combat spam and abuse. hCaptcha checks whether User activity on our Website meets our security requirements. For this purpose, hCaptcha analyzes the behavior of the Website visitor based on various characteristics. This analysis begins automatically as soon as the visitor enters a part of the Website with hCaptcha enabled. For the analysis, hCaptcha evaluates various information (IP address – used for geolocation and traffic analysis; browser type and version and operating system – data from User-Agent headers; data on interaction with CAPTCHA – e.g., mouse movements, time spent solving the task, clicks; cookies or local browser data such as localStorage – may be used for behavioral analysis; anonymized data about the page where CAPTCHA is activated – e.g., URL, domain, page code; unique device or session identifiers – generated, for example, by browser fingerprinting). The data is then immediately anonymized by the service provider.

The legal basis for this processing is our legitimate interest in protecting our Website from abuse and spam [Art. 6(1)(f) GDPR].

The service is provided by Intuition Machines, Inc., based in the USA. Data may be transferred outside the EEA. The legal basis for the transfer is the European Commission's adequacy decision of July 10, 2023, based on Intuition Machines, Inc.'s participation in the "EU-U.S. Data Privacy Framework." Where applicable, [Standard Contractual Clauses](#) developed by the European Commission will also apply.

2.6.2. GOOGLE reCAPTCHA

We use the reCAPTCHA service, which is subject to [Google's Privacy Policy](#) and [Terms of Service](#). We use reCAPTCHA solely to combat spam and abuse on our Website.

reCAPTCHA collects information about hardware and software, such as the IP address of the Website visitor, the URL of the visited page, a full screenshot of the browser window, the URL of the referring page, time spent on the website, mouse movements and keyboard input, information about the operating system and browser, device settings (such as time, language, and location), installed browser plugins, cookies (including Google cookies). Information collected during the use of reCAPTCHA will be used to improve the service and overall security. It will not be used by Google to personalize ads in the Google network. Our legal basis for this processing is our legitimate interest in protecting our Website from abuse and spam [Art. 6(1)(f) GDPR]. We do not process or store data after verification via reCAPTCHA.

2.7. ADDITIONAL INFORMATION

We also collect anonymized statistical data on the number of visits to the Website and downloads from affiliate links.

We do not collect special categories of personal data (including data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data,

health data, sex life, or sexual orientation). Nor do we collect any information about criminal convictions or offenses.

Our Website is not intended for use by children, and we do not knowingly collect data about children.

2.8. INTERACTING WITH US VIA OUR SOCIAL MEDIA PROFILES

Information you provide to us when interacting with our social media profiles (e.g., Facebook, LinkedIn, YouTube) may include your name/nickname, photo, and other information provided in messages or comments.

Generally, we do not combine this information with data you have provided to us through other channels (e.g., via email), unless circumstances indicate otherwise — for example, if you send us a private message on Facebook including your email address and request contact, or if you tag us or create collaborative posts with us.

As part of managing our profiles on social media platforms operated by Meta (Facebook), Meta Platforms Ireland Limited provides us with aggregated statistics that help us better understand the types of User activity on our profile (“Page Insights”).

For more information on data processed as part of Facebook Page Insights, click [HERE](#).

Meta Platforms Ireland Limited and we act as joint controllers in connection with data processing for Page Insights. Information about joint controller responsibilities can be found [HERE](#).

Other social media providers may also provide us with aggregate statistics about activity on our social media profiles.

In connection with your interaction with our social media profiles, your data will be processed by us on the basis of Art. 6(1)(f) GDPR for the purpose of responding to comments, messages, and reviews posted on our profiles, maintaining relationships, managing content published on our profiles, conducting research and analysis on communication effectiveness, and for statistical purposes.

Personal data related to your activity on our social media profiles will be stored until they are deleted or restricted, which you can do yourself using the internal systems of the social media provider.

2.9. OUR FACEBOOK ADS

We use Facebook Ad Manager and Facebook Business Manager tools to efficiently manage advertising campaigns on Facebook and monitor their effectiveness on the Facebook platform. With these tools, we may collect data on User interactions with ads, such as the number of clicks, conversions, or demographic information at an aggregated level, helping us better tailor our advertising activities. This data does not allow us to directly identify the User and is stored within the platform in accordance with the provider’s regulations.

These activities and related data processing take place outside our Website – only within the Facebook platform in accordance with its terms. Registered Facebook users can use the ad management interface in their Facebook profile to adjust their account settings to their advertising preferences.

The campaigns we run allow us to reach appropriate audience segments with our ads. We do not target ads based on individual User data, but we can specify in Facebook’s advertising tools the characteristics of the audience we want to reach. As a result, Meta Platforms Ireland Limited may process event data on our behalf for measurement and analytics services, including preparing reports on the effectiveness of our advertising campaigns and other online content, including conversion analysis via Facebook.

Meta Platforms Ireland Limited is also a joint controller of data as part of the joint processing of event data for targeting ads to Facebook users and their delivery. Joint controller arrangements are available [HERE](#).

Detailed information required by the GDPR and more information on how Meta Platforms Ireland Limited processes personal data, the legal basis, and how to exercise data subject rights against Meta Platforms Ireland Limited can be found in the “[Meta Privacy Policy](#).”

In connection with the use of tools provided by Meta Platforms Ireland Limited, your personal data, to the extent processed by Meta Platforms Ireland Limited on our behalf, may be transferred to third countries, including the United States. The legal basis for the transfer of personal data by Meta Platforms Ireland Limited to Meta Platforms, Inc. (USA) is the European Commission’s adequacy decision of July 10, 2023, based on Meta Platforms, Inc.’s participation in the “EU-U.S. Data Privacy Framework.” Note that Meta Platforms Ireland Limited may also transfer data to other entities outside the European Economic Area in connection with the use of their services, ensuring the implementation of appropriate legal safeguards in accordance with applicable data protection laws.

2.10.ADDITIONAL INFORMATION

In addition to the situations described above, we may process Website Users’ personal data (where applicable) for the following purposes:

- Performing technical activities and resolving technical issues related to Website administration – based on our legitimate interest [Art. 6(1)(f) GDPR],
- Storing data to ensure accountability (including demonstrating compliance with legal obligations) - based on our legitimate interest [Art. 6(1)(f) GDPR],
- Where applicable, establishing, defending, and pursuing claims – based on our legitimate interest [Art. 6(1)(f) GDPR],
- Handling other inquiries and requests you direct to us – based on our legitimate interest [Art. 6(1)(f) GDPR].

If you registered a Remotly Client Account via our Website, please refer to the dedicated privacy information:

- For non-commercial Remotly Client Accounts: “[Privacy Notice for Remotly Software for Non-Commercial Users](#)”
- For commercial Remotly Client Accounts: “[Privacy Notice for Remotly Software for Commercial Users](#)”.

3. TECHNICAL MEASURES

We make every effort to secure your data and protect it from third-party actions. We use all necessary safeguards for servers, connections, and the Website. In particular, communication between your computer and our server, when we collect your personal data, is encrypted using SSL (Secure Socket Layer) protocol. Our databases are protected against third-party access. All connections related to your electronic payments are made through secure, encrypted connections with additional safeguards provided by Payment Operators. When using subcontractors, we carefully verify their credibility and the safeguards they use to protect Users' data.

4. RECIPIENTS OF YOUR DATA

Where applicable, data may be shared with:

- Persons authorized by us, our employees and associates who must have access to data to perform their duties,
- Processors to whom we outsource certain tasks related to personal data processing, e.g., companies servicing our IT systems or providing us with IT tools and server space, companies providing consulting or marketing services, providers of analytical and advertising tools, our advisors, to the extent they process data on our behalf,
- Other entities that will process personal data as independent data controllers: e.g., Payment Operators, business partners (including advertising partners) as part of the tools used on the Website, our advisors,
- Public authorities, if required by law.

5. DATA RETENTION PERIOD

The above sections of the Policy generally indicate the retention periods for personal data, where applicable, or the criteria for determining them. General information about the rules for determining retention periods is provided below.

Personal data processed based on your consent may be processed until you withdraw your consent or until processing is no longer necessary to achieve the purpose for which the data is processed, or when the processing purpose has been achieved and completed, whichever occurs first.

Data processed based on our legitimate interest will be processed until you object (unless we demonstrate that our interests override your interests or fundamental rights and freedoms or for the establishment, exercise, or defense of legal claims), or until processing is no longer necessary to achieve the purpose, or when the purpose has been achieved and completed, whichever occurs first.

Data processed to fulfill our legal obligations will be stored for the period required by those laws.

6. YOUR RIGHTS

In connection with the processing of your personal data, you have, within the limits set by law and where applicable, the following rights:

- Access to your data and the right to rectification, deletion, restriction of processing, and data portability,
- Where we process your data based on your consent, you have the right to withdraw your consent at any time, which does not affect the lawfulness of processing based on consent before its withdrawal,
- The right to object at any time to the processing of personal data based on our legitimate interest, for reasons related to your particular situation,
- The right to lodge a complaint with the President of the Personal Data Protection Office (or the data protection supervisory authority in another country, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement) if you believe that the processing of your personal data violates the GDPR. A list of competent authorities for Member States can be found [HERE](#).

Some of the above rights can be exercised independently:

- Consent for the installation of cookies and related personal data processing for the purposes specified by such files can be withdrawn in the tool for managing cookie consents, available in the footer of our Website under “Cookie Settings.”
- Consent for the processing of certain data within the Remotly Community Account can be withdrawn by deleting the data or changing the relevant privacy settings.
- Other rights can be exercised by sending a message via the contact form available on our Website under “Contact.”

We will make every effort to promptly handle your request and respond to questions regarding the processing of your personal data. We will respond no later than 30 days from the date of your request. If this period needs to be extended due to the complexity of the request or the number of requests received, we will inform you of the extension and the reasons for it.

If there are reasonable doubts as to the identity of the person making the request, we may ask for additional information necessary to confirm the identity of the applicant. Providing such data is not mandatory, but failure to provide it will result in the refusal to fulfill the request.

We keep information about received requests to demonstrate compliance with the accountability principle under the GDPR and to establish, defend, and pursue claims.

CHANGES TO OUR PRIVACY POLICY

Our goal is to ensure the highest possible protection of your data. The development of technology and our services means that the Privacy Policy may be subject to changes.